Appl. No. 10/700,099
Amdt. Dated May 13, 2005
Reply to Office action of February 22, 2005

<u>Remarks/Arguments</u>

Claims 1-25 remain in this application.

The examiner has objected to the specification.

The examiner has objected to claims 1, 3 and 7 because of informalities.

The examiner has rejected claims 1-3 and 25 under 35 USC 102(e) as being anticipated by *Jameson* (United States Published Patent Application 2003/0107597).

The examiner has objected to claims 4-6 as being based on a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

The examiner has indicated that claims 7-19 would be allowable if rewritten or amended to overcome the objection set forth in this office action.

The examiner has indicated that claims 20-24 are allowed.

In view of the above amendments and these remarks, reconsideration of the above noted rejections and objections is respectfully requested.

Objection to the Specification:

By the above amendments, the word "comprises" has been changed to "involves" in the Abstract. Applicant respectfully submits, therefore, that the grounds for the objection to the specification have been cured.

Objections to the Claims:

Claim 1:

Applicant respectfully traverses the objection to claim 1, namely that the "adding" does not occur with the "selecting." However, see Fig. 5 at 210 and 214. At 210, received data is added to existing data (Specification page 17, lines 5-7). At 214, information is transferred to the workflow action initiator 148 to determine an appropriate response (Specification page 17, lines 3-5), which includes selecting an action to be taken that correlates with the matched existing data (Specification paragraph [0057]). The portion of the specification (page 16,

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lines 24-29) cited by the Examiner refers to the portion of the flowchart in Fig. 5 between 208 and 210 when the result at 208 is negative. However, when the result at 208 is positive (and the result at 212 is also positive), then 210 does occur with 214, as described in the specification on page 17 at lines 2-6. Therefore, the "adding" does occur with the "selecting." Applicant respectfully requests, therefore, that the objection to claim 1 due to informalities be withdrawn.

Claim 3:

By the above amendments, a period has been added to claim 3. Applicant respectfully submits, therefore, that the grounds for the objection to claim 3 have been cured.

Claim 7:

Applicant respectfully traverses the objection to claim 7, namely that the "recording the quantifier value" does not occur with the "taking action." However, see Fig. 5 at 210 and 214. At 210, a calculated quantifier value is added to a database (Specification page 17, lines 5-7). At 214, information is transferred to the workflow action initiator 148 to determine an appropriate response (Specification page 17, lines 3-5), which includes selecting an action to be taken (Specification paragraph [0057]). When the result at 208 is positive (and the result at 212 is also positive), then 210 does occur with 214, as described in the specification on page 17 at lines 2-6. Additionally, the "recording the quantifier value" occurs with the "taking action" in order for the action taken to be correlated (at 230) with the quantifier value (Specification paragraph [0056]). Therefore, the "recording" does occur with the "taking." Applicant respectfully requests, therefore, that the objection to claim 7 due to informalities be withdrawn.

Rejections under 35 USC 102(e):

Applicant respectfully traverses the rejection of claims 1-3 and 25 under 35 USC 102(e) as being anticipated by *Jameson*. Claims 1 and 25 are independent. Claims 2 and 3 depend from independent claim 1.

Independent claim 1 calls for an "imaging device." Applicant respectfully

submits that *Jameson* does not disclose an imaging device. Instead, *Jameson* appears to disclose a graphical user interface (GUI). Imaging devices, on the other hand, "are devices that are able either to replicate or to author images. Such devices include printers, plotters, scanners, copiers, etc." (Specification paragraph [0001]) GUIs do not fall within this definition. In fact, Applicant respectfully submits that GUIs have never been held in the relevant technology to be an "imaging device" of any type. Instead, GUIs are displayed on a monitor or display device and require user interaction typically through a keyboard or pointing device. Additionally, since *Jameson* does not disclose an imaging device, *Jameson* also cannot disclose "receiving data from the imaging device," as called for in independent claim 1.

Independent claim 1 also calls for "adding the received data to the existing data." *Jameson*, on the other hand, appears to disclose that multiple "action definitions" can be placed within a single physical file. (*Jameson*, paragraph [0241]) An "action definition" is obtained by looking up an "action identifier" to find a match in an action name table. (*Jameson*, paragraphs [0237]-[0238]) An "action identifier" is obtained from an incoming "action request." (*Jameson*, paragraph [0209]) An "action request" is received via Module Action Request Manager 131. (*Jameson*, paragraph [0208]) In other words, *Jameson* does not disclose that received data (the "action identifier" in the received "action request") is added to existing data (the "physical file"), but rather that other data (the "action definition") that is placed within the file.

Applicant respectfully submits, therefore, that independent claim 1 is not anticipated by, is not obvious in view of, and is patentable over *Jameson*, at least because the reference does not teach or fairly suggest the use of an imaging device, receiving data from the imaging device or adding the received data to existing data. Additionally, since claims 2 and 3 depend from independent claim 1, Applicant respectfully submits that these dependent claims are not anticipated by, are not obvious in view of, and are patentable over *Jameson* for the same reasons.

Independent claim 25 calls for an "imaging device." As discussed above, Applicant respectfully submits that *Jameson* does not disclose an imaging device.

Additionally, since *Jameson* does not disclose an imaging device, *Jameson* also cannot disclose "a means for receiving object identifier data from imaging devices," as called for in independent claim 25.

Independent claim 25 also calls for "a means for quantifying the object identifier data for the imaging devices into current quantifier values." Applicant respectfully submits that *Jameson* does not disclose such a means for quantifying. According to *Jameson*, the Module Get Action Identifier 132 obtains an action identifier from an incoming action request. Normally the action identifier is the name of a known action. (*Jameson*, paragraph [0209]) For example, the action identifier may be a text string that specifies the action name. (*Jameson*, paragraph [0216]) The Module Get Action Identifier 132 obtains the action identifier from the incoming action request by one of the following techniques: looking up and copying a string value that represents the action name, creating a pointer to an existing string name, or de-referencing a numeric code that identifies the actions. (*Jameson*, paragraph [0217]) None of these techniques, however, involves the quantification of any of the data (e.g. the action identifier) in the incoming action request, but rather the simple copying or referencing of the data.

Independent claim 25 also calls for "a means for comparing the current quantifier values with previous quantifier values." Since *Jameson* does not quantify any data into quantifier values, *Jameson* cannot compare current quantifier values with previous quantifier values. Instead, the Module Get Action Definition 140 obtains an action definition by looking up an action identifier in an action name table to find a match. (*Jameson*, paragraphs [0237]-[0238]) The action identifier , however, is not a value arrived at by quantification, as explained above.

Applicant respectfully submits, therefore, that independent claim 25 is not anticipated by, is not obvious in view of, and is patentable over *Jameson*, at least because the reference does not teach or fairly suggest the use of an imaging device, a means for quantifying data into quantifier values or a means for comparing current quantifier values with previous quantifier values.

Allowable Subject Matter:

Applicant respectfully thanks the Examiner for the indication that dependent claims 4-6 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Dependent claims 4-6 depend from independent claim 1. In light of the above remarks with regard to independent claim 1, Applicant respectfully submits that dependent claims 4-6 are allowable without being rewritten in independent form.
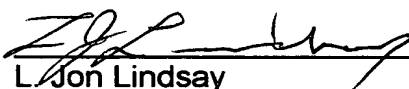
Applicant respectfully thanks the Examiner for the indication that claims 7-19 would be allowable if rewritten or amended to overcome the objection set forth in this office action. Claim 7 is independent, and claims 8-19 depend from independent claim 7. According to the above remarks, however, independent claim 7 is in proper form, and Applicant respectfully requests that the objection to claim 7 due to informalities be withdrawn. Applicant respectfully submits, therefore, that claims 7-19 are allowable without being rewritten or amended.

Applicant respectfully thanks the Examiner for the indication that claims 20-24 are allowed.

For the reasons specifically discussed above, and others, it is believed that pending claims 1-25 define patentable subject matter. Reconsideration of the previous rejections and objections as they might apply to the pending claims is therefore respectfully requested. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Date

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